

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**OBJECTION OF THE UNITED STATES POSTAL SERVICE
TO APWU/USPS-21(a)**
(April 12, 2012)

The United States Postal Service hereby objects to subpart (a) of the above identified interrogatory of the American Postal Workers Union filed on March 29, 2012. Subpart (a) of the interrogatory is stated verbatim and followed by a statement of the bases for the objection.

APWU/USPS-21(a): Please provide the current performance data for Priority Mail and Express Mail.

The Postal Service objects to this interrogatory as irrelevant to the issues raised by the request in the instant docket. Specifically, the current performance data for Express Mail and Priority Mail have no bearing on the issues raised in this proceeding which pertain to market dominant service standards and plant consolidations.

The Postal Service further objects to this interrogatory because the Postal Service considers service performance information for Express Mail and Priority Mail to be commercially sensitive, proprietary, and restricted. Such information could be used by competitors to gain a valuable and unfair competitive advantage.

Finally, the Postal Service objects to this interrogatory because it has been asked and answered. See APWU/USPS-T1—34(a) and (b).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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